REMARKS

The September 17, 2008 Office Action has been carefully reviewed and considered. Claims 1, 3, 8, 9, 12-14 and 19-24 stand rejected under 35 U.S.C. §102(b) as being anticipated by U.S. Patent No. 6,157,538 (Ali). Claims 4, 5, 11 and 18 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Ali in view of Japanese Patent Publication No. 2001-118987. Based on the amendments made herein and the reasons stated below, Applicant respectfully submits that all pending claims are in condition for immediate allowance.

Independent claims 1, 14 and 23 have been amended so that the claimed connecting elements are **elastic**. No new matter is added by way of these amendments. For example, see paragraphs [0017], [0033] and [0035] which describe how the module housing 20 (which includes connecting regions 30 and 31) is elastic and has a higher mechanical deformability than substrates 3, 4 and 5. Ali fails to teach or suggest an elastic connecting element.

A connection socket such as Ali's socket (20) is typically rigid to ensure a good electrical connection with the component inserted into the socket. Ali does not indicate that the socket 20 is elastic. To suggest otherwise calls for pure speculation. A claim is anticipated when a prior art reference describes all of the claim elements, arranged as in the claimed invention. *C.R. Bard, Inc. v. M3 Systems, Inc.*, 157 F.3d 1340 (Fed. Cir. 1998). Claims 1, 3-5, 8-9, 11-14 and 17-23 are patentable over Ali because Ali does not show an elastic connecting element as claimed.

In addition, independent claims 1, 14 and 23 further state that the claimed elastic connecting elements are designed to prevent a deformation of one substrate region to continue to an adjacent substrate region. The Examiner argues that Ali is capable of performing the claimed function. See p. 3 of the Office Action. Yet, the Patent Office fails to offer any evidence tending to support this conclusory statement. It is not readily apparent how Ali's socket 20 is capable of performing the claimed deformation prevention function. Ali makes no mention that

the socket 20 can prevent a deformation of one substrate region to continue to an adjacent substrate region as claimed. Nor does the deformation prevention function appear to be implicit in the operation of Ali's socket 20. Ali's socket 20 provides an electrical connection access point for electronic device 14 and 16. A rigid socket 20 would allow a deformation of one substrate region to continue to the adjacent substrate region. Nothing in Ali teaches or suggests otherwise, and thus the socket 20 is not capable of performing the claimed deformation prevention function. For this additional reason, claims 1, 3-5, 8-9, 11-14 and 17-23 are patentable over Ali.

Independent claim 24 states that the claimed connecting region forms an **articulated hinge** with each of the adjacent substrate regions. The Patent Office dismisses this language as mere functional verbiage. See p. 6 of the Office Action. Applicant respectfully disagrees. The term articulated hinge clearly refers to a structural component of the claimed power semiconductor module. The Patent Office has failed to proffer any evidence showing that Ali's socket 20 is an articulated hinge. Nothing in Ali teaches or suggests the socket 20 is a hinge. Instead, the socket 20 provides an electrical connection access point for electronic device 14 and 16. For this reason alone, claim 24 is patentable over Ali.

Conclusion

In view of the remarks made herein, Applicant respectfully submits that the present application is now in condition for immediate allowance. Action to that affect is respectfully requested. The Examiner is encouraged to contact Applicant's attorney at (919) 854-1844 if any outstanding matters can be readily addressed by a phone call.

Respectfully submitted,

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